



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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Brooklyn, New York 11201*

April 15, 2020

By ECF

Honorable Rachel P. Kovner
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Chunn, et al. v. Warden Derek Edge,*
Civil Action No. 20-cv-1590 (Kovner, J.) (Mann, M.J.)

Dear Judge Kovner:

Earlier this evening, Respondent filed a letter in response to the Court's April 14, 2020 order regarding expedited discovery. Shortly thereafter, the Court ordered Respondent to promptly advise the Court of his adversary's position on Respondent's proposed extension requests.

Respondent's counsel apologizes for their oversight in not initially asking Petitioners as to whether they consent to Respondent's requests for: (1) a three-business day extension, until April 20, to supplement his response (if any) regarding soap purchases and deliveries; and (2) a three-business day extension, until April 20, to provide further information regarding Petitioners' request for production of sick-call requests for medical care. *See* Dkt. No. 47. Respondent's counsel sincerely apologizes for this inadvertent omission and any inconvenience ensuing therefrom.

Immediately upon seeing the Court's order this evening, Respondent's counsel emailed Petitioners to request their position regarding Respondent's extension requests. Given the late hour, Respondent has, understandably, not yet received a response from Petitioner. Respondent will advise the Court of Petitioners' position as soon as he receives it.

Respondent thanks the Court for its consideration of this matter.

Respectfully submitted,

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cc: The Honorable Roanne L. Mann, U.S. Magistrate Judge
All Counsel of Record (by ECF)